

MARK SCOGGINS
SCOGGINS LAW OFFICE, LLC
2nd Floor, MIC Building, Chalan Monsignor Guerrero
San Jose Village
P.O. Box 501127
Saipan, MP 96950
Telephone No.: (670) 234-7455/234-7427
Facsimile No.: (670) 234-7256

Attorney for Plaintiff, Yantze Corporation.

FILED

Clerk
District Court

JUL 08 2020

for the Northern Mariana Islands
By [Signature]
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

YANTZE CORPORATION,

Plaintiff,

vs.

AMERICAN SINOPAN, LLC,

Defendant.

Civil Case No. 1:20-CV- 00015

COMPLAINT

Plaintiff Yantze Corporation hereby brings a complaint for breach of contract and unjust enrichment against Defendant American Sinopan, LLC, and alleges as follows:

Jurisdiction & Venue

1. This Court has jurisdiction of this matter pursuant to 28 U.S.C. §1332.
2. This Court is the proper venue for this matter in accordance with 28 U.S.C. §1391(b)(2).

Parties

3. Plaintiff Yantze Corporation ("Yantze") is a corporation organized under the laws of the Commonwealth of Northern Mariana Islands.

4. Defendant American Sinopan, LLC ("American Sinopan") is a limited liability company organized under the laws of the Commonwealth of Northern Mariana Islands.

5. The sole member of American Sinopan, LLC is Imperial Pacific Real Estate & Hotel Management Company Limited, a British Virgin Islands company.

Facts

6. In approximately October of 2017, Yantze entered into an agreement with American

1 Sinopan whereby Yantze agreed to provide construction contracting services for the Heaven II Hotel
2 facility on Capitol Hill, Saipan.

3 7. The agreement is a binding an enforceable contract between Yantze and American
4 Sinopan.

5 8. Yantze performed under the terms of the agreement in good faith, and in a good and
6 workmanlike manner.

7 9. American Sinopan has failed to pay amounts owed under the agreement in the amount
8 of at least \$80,000.

9 10. American Sinopan has breached the agreement with Yantze to Yantze's damage.

10 11. In the alternative, American Sinopan is unjustly enriched by the services that Yantze
11 provided to American Sinopan.

12
13 **Prayer for Relief**

14 WHEREFORE, Petitioner / Plaintiff Yantze Corporation complains to this Court for the
15 following relief:

- 16 1. For an award of actual damages in favor of Yantze Corporation and against American
17 Sinopan, LLC in an amount to be proven at trial;
- 18 2. For an award of pre and post-judgment interest as may be allowed by law or contract;
- 19 3. For an award of attorney's fees as may be allowed by law or contract; and
- 20 4. For such other and further relief as this Court deems just and equitable.

21
22 Respectfully submitted this 8th day of July, 2020.

23
24 
25 MARK A. SCOGGINS
26 Attorney for Yantze Corporation
27
28